

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

ON THE TITLE V DRAFT PERMIT V-02-003

Western Kentucky Energy Corporation

Coleman Station

P.O. Box 1518, Henderson, Kentucky, 42419

JULY 9, 2004

HERBERT CAMPBELL, REVIEWER

PLANT I.D. # 021-091-00003

APPLICATION LOG # 50043

**SOURCE DESCRIPTION:**

The source is an existing source electric power generating plant in Hancock County, Kentucky, that has three pulverized coal fired boilers. Two of the boilers have an input rating of 1565 MMBtu/hour and one has an input rating of 1586 MMBtu/hour. All units are dry bottom, wall fired.

**PUBLIC AND U.S. EPA REVIEW:**

On August 14, 2003, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Hancock Clarion* in Hawesville, Kentucky. The public comment period expired 30 days from the date of publication. During this time, no comments were received from the public.

Comments were received from Western Kentucky Energy on September 10, 2003. Attachment A to this document lists the comments received and the division's response to each comment. Minor changes were made to the permit as a result of the comments received. Please see Attachment A for a detailed explanation of the changes made to the permit.

Since comments were received from the facility during the public comment period, the permit now being issued is a proposed permit. U.S. EPA has 45 days from the date of the issuance of the proposed permit to comment on it. If no comments are received from U.S. EPA during this period, the proposed permit shall become the final permit.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

# ATTACHMENT A

## Response to Comments

Comments on Western Kentucky Energy's Coleman Station Draft Title V Air Quality Permit submitted by Steve T. Noland, Senior Environmental Scientist.

1. Permit Application Summary Form

Following "Source Description:" the last line sentence reads "All units are dry bottom, wall fired with fly ash reinjection." The units do not have fly ash reinjection. Please omit "...fly ash reinjection."

**Response:** *The Division concurs with the comment and has revised the permit as suggested by the source.*

1. Emission Units 01-03 Indirect Heat Exchangers

Pages 5 of 31 and 6 of 31 are identical.

**Response:** *The Division concurs with the comment and has revised the permit as suggested by the source.*

3. Description

Regarding "Control Equipment" for NO<sub>x</sub>. Each of the units still have their low NO<sub>x</sub> burners that were installed to meet Title IV requirements, however, in preparation for compliance with the new NO<sub>x</sub> SIP Call Regulations, a "Rotary Over Fire Air" system was added to Unit 1 and an "Over Fired Air" system was added to Unit 2. Unit 3 will receive additional NO<sub>x</sub> control technology in 2004, however, at this time, the type of technology we will add to Unit 3 has not been determined.

**Response:** *The Division acknowledges the Source's comment. However, this will be addressed upon receipt of a complete application, and possible reopening of the permit.*

4. Specific Monitoring Requirements

Regarding:

The regulation 401 KAR 52:020, Section 1b (III) is referred throughout this heading of EmissionUnits 01-03. We cannot find Section 1b (III) of this regulation. Please check the intent and accuracy of quoting this Section of 52:020.

**Response:** *The Division acknowledges the Source's comment. Section 1b (III) is contained in material incorporated by reference by regulation 401 KAR 52:020, specifically Cabinet Provisions and Procedures for issuing Title V Permits. However to clarify the reference for the Source, that reference will be replaced with 401 KAR 52:020 Section 10.*

Regarding:

- d) "...opacity value exceeds the opacity standard, the permittee..."

We will be establishing a "trigger level" for particulate emissions during compliance testing. Therefore, the verbage below should be correct and will be consistent with other TitleV permits for coal fired, electric generating units.

- d) "...opacity value exceeds the (opacity standard) trigger level, the permittee..."

Regarding:

- e) "...any necessary repairs. If visible emissions from the stack are seen, the permittee shall..."

Visible emissions can and will be seen at any time when coal fired units are in operation in the day time and most anytime the sky is clear at night. The verbage below should be correct for the intent of this paragraph and will be consistent with other Title V permits for coal fired, electric generating units.

- e) "...any necessary repairs. If visible emissions from the stack are (seen) perceived to exceed the standard, the permittee shall..."

**Response:** *Monitoring requirements will not be changed. In the permits that are referred to for former monitoring requirements, 401 KAR 50:035 was repealed by 401KAR 50:071 on January 15, 2001 and replaced by 401 KAR 52:020. The permit has been amended as follows; " If any visible emissions are seen, then opacity must be determined using Reference Method 9, or by accepting the concurrent readout from the COM and perform an inspection of the control equipment and make any necessary repairs."*

## 5. Emission Unit 05 Coal Handling Operations

### Applicable Regulations

The regulation 401 KAR 61:020 is correctly referenced to be applicable for "Existing Process Operations", however, the emission points listed under Emission Unit 05 do not fit the description of applicability listed in this regulation. The Applicability description within Section 1 of this regulation clearly states that it applies to each affected facility or source associated with a Process Operation *Section 1*.

*Applicability. (1) The provisions of this administrative regulation shall apply to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced before the classification date defined below.*

The definition under Section 2 for is (1) "Process Operation" means any method, form, action, operation or treatment of manufacturing or processing, and shall include any storage or handling of materials of products, before, during, or after manufacturing or processing.

Coal handling operations have never fallen under this regulation in the past. To be consistent with Title V permits for other coal fired electric utility stations such as our Reid and Henderson Station II, that fall under the same regulations as Coleman, these emission points should be included with Emission Point 04.

**Response:** *The Division acknowledges the comment. Coal handling operations of permits for other coal fired electric utility stations such as Kentucky Utilities - E.W. Brown Station for their coal handling equipment and operations that were constructed during the 1950's are treated in this way. Further, the coal is crushed and pulverized during processing for combustion in the boilers. Thus, the Division does not concur with the comment and has not revised the permit as suggested by the source.*

## 6. Emission Unit 07 Ash and Sludge Handling Operations

The permit does not contain an Emission Unit 06, but goes from Emission Unit 05 to 07. Considering the change recommended above, Emission Unit 07 should become Emission Unit 05.

**Response:** *The Division acknowledges the comment. The Division does not concur with the comment. However the Division has revised the permit for Emission Unit 07 to be Emission Unit 06.*